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8 **IN THE UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,)	Case No.2:17-cr-00287-JCM-VCF
)	
11 Plaintiff,)	
)	
12 vs.)	STIPULATION AND
)	ORDER TO PERMIT TRAVEL
13 CHANH TRINH,)	OUTSIDE DISTRICT OF NEVADA
)	
14 Defendant.)	
)	

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Eric C. Schmale and
17 Thomas W. Flynn, Trial Attorneys, Tax Division, counsel for the United States of America, and
18 Defendant Chanh Trinh, and his counsel Shawn Perez, that Mr. Trinh be allowed to travel
19 outside the District of Nevada to Southern California to spend the holidays with his wife, family
20 members and his minor children.

21 Specifically, the parties stipulate and agree that Mr. Trinh shall be permitted to travel
22 from Las Vegas to Southern California on December 23, 2018 through his return on January 5,
23 2019. Mr. Trinh will be taking his children, ages 5 and 7, and his wife to visit relatives and tour
24 several sites in Southern California. Upon his return he shall report his arrival to his pretrial
25 officer.

26 Counsel for Defendant attempted to contact Mr. Trinh's pretrial officer and left a message
27 in order to seek approval. As of the date of this stipulation, counsel has not received a return
28 call. Because of holiday schedules this stipulation is being filed in order to assure that the Trinh

1 family will be able to plan for the holiday week.

2
3 Dated this 17th day of December, 2018.

4 UNITED STATES OF AMERICA

LAW OFFICE OF SHAWN R. PEREZ

5 By: /S/ Eric C. Schmale, Esq
ERIC C. SCHMALE, ESQ
6 THOMAS W. FLYNN, ESQ
Trial Attorneys, Tax Division
7 Counsel for the Plaintiff

By: /s/ Shawn R. Perez, Esq.
SHAWN R. PEREZ, ESQ
Counsel for Defendant
CHANH TRINH

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11 **ORDER**

12 UPON GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED that
13 Defendant Chanh Trinh be permitted to travel from Las Vegas, Nevada to Southern California in
14 order to spend time with his children and family for the holidays, from the morning of December
15 23, 2018, until his return on the evening of January 5, 2019. Upon his return he shall report his
16 arrival to his pretrial officer.

17 All other current conditions of Defendant's pre-trial release shall remain in place.

18 IT IS SO ORDERED.

19
20 Dated: December 18, 2018.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of December, 2018, the undersigned served the foregoing on all counsel herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

/s/ Shawn R. Perez, Esq.
SHAWN R. PEREZ, ESQ.